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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PROTECT OUR GIRLS, a Committee for
Political Action (PAC) Advocating Passage, and
MELISSA CLEMENT, an individual,

Plaintiffs,

vs.

BARBARA CEGAVSKE in her official capacity
as Nevada Secretary of State, JOSEPH P.
GLORIA in his official capacity as Clark County
Registrar of Voters, DEANNA SPIKULA in her
official capacity as Washoe County Registrar of
Voters, KRISTINA JAKEMAN in her official
capacity as Elko County Clerk, SADIE
SULLIVAN in her official capacity as Lander
County Clerk, LACEY DONALSON in her
official capacity as Pershing County Clerk-
Treasurer, VANESSA STEVENS in her official
capacity as Storey County Clerk-Treasurer,
NICHOLE BALDWIN in her capacity as White
Pine County Clerk, SANDRA MERLINO in her
official capacity as Nye County Clerk TAMMI
RAE SPERO in her official capacity as
Humboldt County Clerk, KATHY LEWIS in her
official capacity as Douglas County clerk-
Treasurer, LINDA ROTHERY in her official
capacity as Churchill County Clerk-Treasurer,
LACINDA ELGSN in her official capacity as
Esmeralda County Clerk, LISA HOEHNA in her
official capacity as Eureka County Clerk,
CHRISTOPHER NEPPER in his official
capacity as Mineral county Clerk-Treasurer
NIKKI BRYAN in her official capacity as Lyon
County Clerk-Treasurer, and Aubrey Rowlett in
her official capacity as Carson city Clerk-
Recorder,

Defendants.

Case No.: 3:20-cv-00515-MMD-WGC

**DEFENDANT JOSEPH P.
GLORIA'S ANSWER TO
PLAINTIFFS' COMPLAINT**

1 Comes now Defendant Joseph P. Gloria, Registrar of Voters for Clark County, by and
2 through his counsel, Steven B. Wolfman, District Attorney, by Mary-Anne Miller, County
3 Counsel and, as an Answer to the Complaint on file herein, admits, denies and pleads further
4 as follows:

5 Nature of the Action

6 1. This Defendant admits the allegations made in Paragraph 1 -3 of the Complaint
7 on file herein.

8 Parties

9 2. This Defendant is without sufficient information or belief upon which to form a
10 basis for responding to the allegations made in Paragraphs 4 and 5 of the Complaint on file
11 herein, and on that basis denies each and every allegation contained therein.

12 3. This Defendant admits the allegations contained in Paragraphs 6 – 22 of the
13 Complaint on file herein.

14 Jurisdiction and Venue

15 4. This Defendant admits the allegations contained in Paragraphs 23-25 of the
16 Complaint on file herein.

17 5. This Defendant is without sufficient information or belief upon which to form a
18 basis for responding to the allegations made in Paragraphs 26 and 27 of the Complaint on file
19 herein, and on that basis denies each and every allegation contained therein.

20 Factual Background

21 A. The Initiative

22 6. This Defendant admits the allegations contained in Paragraphs 28-30 of the
23 Complaint on file herein.

24 B. The Covid-19 Pandemic

25 7. This Defendant is without sufficient information or belief upon which to form a
26 basis for responding to the allegations made in Paragraphs 31 - 40 of the Complaint on file
27 herein, and on that basis denies each and every allegation contained therein.
28

1 8 This Defendant is without sufficient information or belief upon which to form a
2 basis for responding to the allegations made in Paragraphs 31 - 40 of the Complaint on file
3 herein, and on that basis denies each and every allegation contained therein.C. Signature
4 gathering during the Pandemic

5 9. This Defendant is without sufficient information or belief upon which to form a
6 basis for responding to the allegations made in Paragraphs 50-54 of the Complaint on file
7 herein, and on that basis denies each and every allegation contained therein.

8 D. Nevada and Other States Have Taken Action

9 10. This Defendant admits the allegations contained in Paragraphs 55-58 of the
10 Complaint on file herein.

11 11. This Defendant is without sufficient information or belief upon which to form a
12 basis for responding to the allegations made in Paragraphs 59-64 of the Complaint on file
13 herein, and on that basis denies each and every allegation contained therein.

14 E. Nevada Secretary of State and the Initiative

15 12. This Defendant is without sufficient information or belief upon which to form a
16 basis for responding to the allegations made in Paragraphs 65-66 of the Complaint on file
17 herein, and on that basis denies each and every allegation contained therein.

18 13. This Defendant notes that Paragraph 67of Plaintiffs' Complaint contains legal
19 arguments that do not require a response.

20 CLAIM 1:

21 14. This Defendant realleges and incorporates by reference his responses to all prior
22 paragraphs of Plaintiff's Complaint in answer to Paragraph 68 of Plaintiffs' Complaint.

23 15. This Defendant notes that Paragraph 69 of Plaintiffs' Complaint contains legal
24 arguments that do not require a response.

25 16. This Defendant denies the allegations contained in Paragraphs 70-75 of
26 Plaintiffs' Complaint.

27 ...

28 ...

1 CLAIM 2:

2 17. This Defendant realleges and incorporates by reference his responses to all prior
3 paragraphs of Plaintiff's Complaint in answer to Paragraph 76 of Plaintiffs' Complaint.

4 18. This Defendant notes that Paragraphs 77-78 of Plaintiffs' Complaint contains
5 legal arguments that do not require a response.

6 19. This Defendant denies the allegations contained in Paragraphs 79-84 of
7 Plaintiffs' Complaint.

8 CLAIM 3:

9 20. This Defendant realleges and incorporates by reference his responses to all prior
10 paragraphs of Plaintiff's Complaint in answer to Paragraph 85 of Plaintiffs' Complaint.

11 21. This Defendant notes that Paragraph 86 of Plaintiffs' Complaint contains legal
12 arguments that do not require a response.

13 22. This Defendant denies the allegations contained in Paragraphs 87-92 of
14 Plaintiffs' Complaint.

15 CLAIM 4:

16 23. This Defendant realleges and incorporates by reference his responses to all prior
17 paragraphs of Plaintiff's Complaint in answer to Paragraph 93 of Plaintiffs' Complaint.

18 24. This Defendant notes that Paragraph 94 of Plaintiffs' Complaint contains legal
19 arguments that do not require a response.

20 25. This Defendant denies the allegations contained in Paragraphs 95-100 of
21 Plaintiffs' Complaint.

22 CLAIM 5:

23 26. This Defendant realleges and incorporates by reference his responses to all prior
24 paragraphs of Plaintiff's Complaint in answer to Paragraph 101 of Plaintiffs' Complaint.

25 27. This Defendant notes that Paragraph 102 of Plaintiffs' Complaint contains legal
26 arguments that do not require a response.

27 28. This Defendant denies the allegations contained in Paragraphs 103-108 of
28 Plaintiffs' Complaint.

CLAIM 6:

29. This Defendant realleges and incorporates by reference his responses to all prior paragraphs of Plaintiff's Complaint in answer to Paragraph 109 of Plaintiffs' Complaint.

30. This Defendant notes that Paragraph 110 of Plaintiffs' Complaint contains legal arguments that do not require a response.

31. This Defendant denies the allegations contained in Paragraphs 111-116 of Plaintiffs' Complaint.

FIRST AFFIRMATIVE DEFENSE

The Complaint fails to state a valid claim for relief against this Defendant.,

SECOND AFFIRMATIVE DEFENSE

Plaintiffs failed to take timely action to assert the claims in this Complaint, and relief should be barred on grounds of equity.

THIRD AFFIRMATIVE DEFENSE

The damages claimed in this Complaint are not caused by this Defendant, and relief should not be ordered against him for the actions of others.

FOURTH AFFIRMATIVE DEFENSE

This Defendant is entitled to qualified immunity for the claims asserted in the Complaint.

FURTHER AFFIRMATIVE DEFENSES

This Defendant reserves the right to amend his answer to allege affirmative defenses if subsequent investigation so warrant.

WHEREFORE, this Defendant prays that:

1. Plaintiffs be awarded none of the relief sought in their complaint;

2. This Defendant be awarded its costs and fees incurred in the defense of this action; and

...

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3. This Defendant be awarded such other and further relief as to this Court seems warranted.

DATED this 15th day of October, 2020.

STEVEN B. WOLFSON
DISTRICT ATTORNEY

By: /s/ Mary-Anne Miller
MARY-ANNE MILLER
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*Attorneys for Defendant Joseph P. Gloria,
Clark County Registrar of Voters*

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Clark County District Attorney and that on this 15th day of October, 2020, I served a true and correct copy of the foregoing **Defendant Joseph P. Gloria's Answer To Plaintiffs' Complaint** by U.S. District Court CM/ECF Electronic Filing to:

David Omara, Esq.
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*Attorneys for Plaintiffs
Protect Our Girls
Melissa Clement*

Herbert Kaplan, Esq.
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*Attorney for Defendant
Deanna Spikula – Washoe County
Register of Voters*

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*Attorney for Defendants
Nichole Baldwin - White Pine County
Clerk, Nikki A. Bryan – Lyon County Clerk
Treasurer, Lacey Donaldson – Pershing
County Clerk Treasurer, Lisa Hoehna –
Eureka County Clerk, Kristina Jakeman –
Elko County Clerk, Kathy Lewis –
Douglas County Clerk Treasurer,
Lisa Lloyd – Lincoln County Clerk,
Sandra Merlino – Nye County Clerk,
Linda Rothery – Churchill County Clerk
Treasurer, Tammi Rae Spero – Humboldt
County Clerk, Vanessa Stevens – Storey
County Clerk Treasurer, Sadie Sullivan –
Lander County Clerk*

/s/ Afeni Banks
An Employee of the Clark County District
Attorney's Office – Civil Division